

REMARKS

This response is to the official action mailed on the above-referenced case on November 20, 2006. Claims 1-18 are standing for examination. In the action the Examiner makes numerous objections to the specification and claims for informalities. Claims 1-18 are rejected by the Examiner under 35 U.S.C. 112. Claims 1-8 are rejected under 35 U.S.C. 101 because the examiner alleges that the claims are drawn to non-statutory subject matter. Claims 1-18 are rejected under 35 U.S.C. 102(e) as being anticipated by Linton et al. (2004/0015822) hereinafter Linton.

In response to the alleged problems in the specification, and the examiner's requirements for correction, the applicant has caused to be prepared and filed herewith a substitute specification incorporating all of the corrections mandated by the examiner. No new matter has been added. A marked-up version of the as-filed specification is provided as well, to show exactly the changes made.

In response to the Examiner's rejections and objections in the claims, applicant herein cancels claims 1-18 and provides new claims 19-28 which more particularly point out and distinctly claim the subject matter believed to be patentable by the applicant.

Regarding the 112 and 101 rejections, applicant believes the rejections are moot in view of the new set of claims provided for examination.

Applicant points out that the examiner seems to have viewed the invention in the limited context of software programs, program components and their assembly, in view of the art of Linton. The present invention pertains to data modeling, in general, and provides a generic mechanism for dealing with any kind of model, not just object models. Applicant's invention provides a meta modeling framework which can be used to specify any kind of models. Some of the example models are process models, object models, state transition models, user interaction models, etc.. One novel aspect of the invention is that it extends the meta modeling construct 'association' with the concept of 'ownership' and uses this concept to provide semantics to versioning and

configuration management of models. This is clearly unknown in the current art of data modeling.

Further, the 'component' construct as taught in the present invention is not to be confused with the concept of software components which are units of behavior with interfaces and programmatic implementations, as in the art of Linton. A component in the present invention, is merely a grouping construct that is used for grouping an arbitrary set of model elements. The invention presents a mechanism that uses association ownership semantics to address the configuration management issues of version compatibility and configuration completeness.

The invention of Linton, on the other hand, pertains to the world of software programs, program components and their assembly. A software component is a unit of behavior with interfaces and programmatic implementations. Applicant's invention pertains to the art of models and the definition of components is different than that of Linton. The examiner seems to compare the association ownership teaching of applicant's invention with the parent-child relationship as taught in Linton. These are not the same. The teaching of association in applicant's invention is generic as it can be used for modeling any kind of relationship, and the semantics of ownership are orthogonal to the semantics of parent-child relationship.

For example, in a parent-child relationship, deletion of parent implies deletion of all children. No such thing is implied by our notion of 'ownership'. The balance of the art, and the published papers provided by the Examiner also pertains to the world of programs and program components. None of them present techniques that can deal with the issues of completeness and compatibility at a generic level that is applicable to all kinds of models as taught and claimed in the present invention.

Therefore, applicant believes independent claims 19 and 24 are patentable as argued above. Dependent claims 20-23 and 25-28 are patentable on their own merits, or at least as depended from a patentable claim. Applicant respectfully requests reconsideration and the case be quickly passed to issue.

If there are any time extensions required for response in addition to any

extension petitioned and paid with this response, such petition is requested, and if there are any fees due over any fees paid with this response, authorization is given to deduct the fees from deposit account 50-0534.

Respectfully submitted,
Sreedhar Sannareddy Reddy et al.

By *Donald R. Boys*
Donald R. Boys
Reg. No. 35,074

Central Coast Patent Agency, Inc.
3 Hangar Way, Suite D
Watsonville, CA 95076
831-768-1755